

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 5:15CR15-RLV
)	
v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO FILE
(3) DAVID BROWNING)	MOTION FOR RESTITUTION
_____)	

NOW COMES the United States of America, by and through Jill Westmoreland Rose, United States Attorney for the Western District of North Carolina, and respectfully requests that this Court continue the restitution briefing deadline to allow the parties additional time to reach an agreed upon resolution in this matter. Defendant does not oppose this motion. In support of this motion, the United States asserts the following:

1. Defendant Browning appeared before this Court for sentencing on February 7, 2017, on charges related to engaging in a child exploitation enterprise, in violation of 18 U.S.C. §2252A(g). A judgment was entered on February 8, 2017. The issue of restitution was deferred for 90 days. *See*, Judgment, Doc. No. 123, p. 6.
2. The parties have worked diligently to resolve this matter. There are at least fifteen victims seeking restitution from Defendant. The documentation submitted in support of the requests is voluminous. Furthermore, some of the restitution requests were received from series that depicted multiple victims. The government has worked to determine which victims were depicted in the images involved in this case, and are therefore entitled to seek restitution. The government has consulted with several of the victims' attorneys and still needs to consult other attorneys.

3. Counsel for the government and defense counsel need additional time to allow the government to speak to victims' attorneys and then work out a resolution. Because a restitution agreement with the victims would obviate the need for this Court to determine a restitution amount, the parties request additional time.
4. The government has consulted with defense counsel, who does not oppose this motion.

Accordingly, the United States respectfully requests an extension of this Court's briefing deadline until July 31, 2017, to allow the parties to fully explore a possible agreed-upon restitution resolution. In the event that restitution is agreed upon prior to that date, the parties will file notice of this agreement with the Court.

RESPECTFULLY SUBMITTED, this the 15th day of June, 2017.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, June 15, 2017, the foregoing was duly served upon counsel for the defendant by electronic means via the Court's ECF system to:

Steven T. Meier
Attorney for Defendant
steve@meierlawnc.com

This the 15th day of June, 2017.

s/ Cortney S. Randall
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